Amelia Brown, Disability Rights Office
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C.   20554

Supplement Petition for Exemption from Closed Captioning Requirements

Reference CGB-CC-0203

The intent of First Baptist Church of Fort Smith is to keep HOPE FROM ABOVE which

is the television broadcast of the Sunday morning service, a live program.   The purpose is to

provide this service to those people of western Arkansas and eastern Oklahoma who cannot

attend a service.   The church has already been planning to purchase a character generator to

generate the words of the songs on the screen.   We have had request of several of our viewers

over the past few years for this service.   This can easily be done on our live service with the

proposed piece of equipment because we do know ahead of time the songs to be used in each

service. . (See attachment #1)

Since our pastor does not use notes in his sermons each week, to closed caption his

sermon and to do it accurately is nearly impossible.   We have researched all areas of possibilities

in doing this on our live service.   One would be a voice recognition system for his sermons.

(See attachment #2)   This is said to be only about 90% accurate.   The cost of this equipment will

be $4,616.00 plus training.

The second option would be to out source the program to a firm such as Aberdeen

Captioning. (See attachment # 3).   The cost per year would be $6,500.00 plus the cost of two

toll-free phone lines installed to connect the service. This is not 100% accurate.

The only other option would be to tape delay the program one week and add the captioning as previously stated in our earlier petition at a cost of $7,995.00 for equipment from CPC. (See attachment #4)

Also attached is a copy of the income and expense summery of the First Baptist Church of Fort Smith as requested in your previous correspondence. . (See attachment #5)

Conclusion

As shown by this supplement Petition and its attachments, we ask that the Commission consider granting a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden, not only on the grounds of the additional expense, but because of the service being broadcast live, there is significant difficulty in captioning our Pastor's sermons each week and doing it with accuracy.

If more information is needed, please contact me at the address provided below.

Carl Riggins
Director of Media Ministries
First Baptist Church of Fort Smith
P. O. Box 609
Fort Smith   AR 72902
479 788-6105
criggins@fsfbc.org

PRICE QUOTE
ELECTRONIC VIDEO SYSTEMS
Mark deLinde

102 West Ashley
Benton, AR 72015

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Telephone (501) 315-7499
Fax (501) 315-9007

Bob Dyer - First Baptist Church
Character Generator
January 9, 2006   Proposal #84596

Item	Qty	Description	Unit Cost	Total
01	01	Compix LCG5000R Stand Alone Video Character Generator (19" rack mount case) Composite, Y/C, Alpha Key, Port for Optional SDI Output Card. includes: VideoCG™ GenCG, GenPlay animation bridge software, Scheduler Suite, Remote Create/Edit Suite, NewsScroll, Background Images CD, True Type Fonts CD, Photo Objects CD & Textures CD, 12 month limited warranty. List: $4,795.00	$4,395.00	$4,395.00
02	01	VGA Monitor Required		$ 500.00

OPTIONAL

03	01	Compix Media CYNERG Plus (19" Rackmount Case) (Two sets of Composite video or Y/C video inputs and outputs with two Alpha keys and two ports for optional SDI output cards) **Two Full VideoCG™** Character Generators on a complete stand-alone system including GenCG software with Direct Animation Import Feature, NewsScroll software, Scheduler Suite, Remote Create/Edit Software (RCES), Digital Juice Jumpbacks Volume 21, Ulead Cool3D Production Studio software, Animation Template Collection, Adobe Photoshop Elements, Hemera Big Box of Art 1 Million, 4000 True Type Fonts CD, 100 Background CD, 100 Texture CD, and 12 Month Limited Warranty List: $ 8995.00	$ 8395.00	$ 8395. 00
02	02	VGA Monitor Required	$ 500.00	$ 1000.00

****Pricing does not include shipping or applicable State & Local Sales Tax.

CPC®

Computer Prompting & Captioning Co.

1010 Rockville Pike, Suite 306
Rockville, Maryland 20852-1419, USA
301-738-8487 • FAX 8488 • TTY 8489
info@cpcweb.com • www.cpcweb.com

PROPOSAL FOR A CPC-600 CAPTIONING SYSTEM

DATE: 3/7/06

To:
Carl Riggins
First Baptist Church
PO Box 609
Fort Smith, AR 72902

479-788-6105
Fax: 479-782-8044
criggins@fsfbc.org

Qty	Items & Descriptions	Unit Price	Extended Price
1	CPC-600 CaptionMaker® software including: One CD containing CPC software One Practice CPC-600 Video for training One CPC Protection Box One CPC-600 Manual One Caption-Key Manual	2,995.00	2,995.00
1	10% NRB discount for purchases made by 3/21/06	-299.00	-299.00
1	IBM ViaVoice® Speech Recognition software	250.00	250.00
1	Link PCE-845/D Analog Component/Composite Closed Caption Encoder, Open Caption Character Generator, Decoder with 9 pin male to female serial cable	1,200.00	1,200.00
1	Dazzle DVC-80 USB video display device (all Windows except NT)	75.00	75.00
1	Mask Microphone for use by shadow speaker with USB connector	265.00	265.00
1	Headset Microphone with USB connector optimized for speech recognition software for use by instructor	95.00	95.00
1	Tax (MD 5%) (for Maryland customers only)	0	0
1	Shipping and handling (UPS Ground)	35.00	35.00
	TOTAL		$4,616.00

Note: Both microphones are not absolutely needed. But they will give you flexibility when using shadow speakers to repeat what the talent is saying.

Prepared by Sidney Hoffman
M.A. Computer Systems, M.S. Audiology

Software Support Plan

Five free hours of software phone support provided for 12 months following the date software license began. Below support plan(s) begin when that free support ends.

Support Plan for the CPC-600
1 year total of 5 hours 10% of $2,995 = $295 ($250 if purchased at time of software purchase)

2 years total of 10 hours 18% of $2,995 = $539 ($458 if purchased at time of software purchase)

3 years total of 15 hours 24% of $2,995 = $718 ($610 if purchased at time of software purchase)

4 years total of 20 hours 28% of $2,995 = $838 ($712 if purchased at time of software purchase)

Lifetime Unlimited 30% of $2,995 = $898 ($763 if purchased at time of software purchase)

C Aberdeen Captioning
committed to the WORD

22362 Gilberto, Suite 230
Rancho Santa Margarita, CA 92688
ph. (800) 688-6621   *fax* (949) 858-4405
www.abercap.com

March 21, 2006

Dear Carl,

The following is the pricing to caption your 60-minute weekly program.

Live Captioning

60-minute program   ***$125 per program**
98% accuracy or better for dialogue under 200 wpm

*First Baptist Church Fort Smith will need to provide two toll-free phone lines, one for connecting to an audio feed and the second for connecting to the encoder's modem. A list of all speakers, subject matter, program rundown, and any technical words that may be used within the program needs to be provided to Aberdeen Captioning prior to the program's live recording. This is necessary to provide a more accurate captioning service. If this is not provided, some unique words may be jumbled on the screen.

Please call me with any questions you may have. We look forward to providing you with excellent captioning to reach the hearing-impaired and others for Jesus Christ.

Best regards,

Becky Isaacs

CPC

Windows Captioning Solutions

Computer Prompting & Captioning Co.   GSA #GS-35F-4672G

A Certified 8(a) Company

CaptionMaker® & CCaption™ Software

Encode Without Hardware (CPC-700NLE & CCaption)
- No generation loss when encoding captions
- No need for any hardware caption encoder or subtitle character generator
- Software so unique that it's patented (#6,895,166)

Post-Production Captioning
- Captions all analog and digital videotape formats including HD
- Captions DVD and Video-on-Demand Webcasts (CPC-700, 700NL and 700NLE)
- Frame precise synchronization between dialogue and captions using time code (CPC-700, 700NL and 700NLE)
- Caption encoding is fully automated using time code (CPC-700, 700NL and 700NLE)
- Synchronization is done on the fly or using the computer timer (CPC-600)
- Imports files from multiple formats including: ASCII, Word, WordPerfect, Cheetah, Captions Inc., Caption Center, Softni
- Machine control may be used to control VTRs
- Encode captions without losing a generation with CCaption

Realtime Captioning
The CaptionMaker software can caption live events using:
- Any steno software that writes to the keyboard buffer
- Speech recognition software
- Speed typing software

Subtitling
The CaptionMaker software can be used to subtitle videos using a number of hardware character generators, or CPC's software character generator.

DVD Captioning & Subtitling
- Provides caption and subtitle files for most major DVD authoring systems (CPC-700, 700NL, and 700NLE)

Webcast Captioning
- Generates Webcast files for Windows Media Player, Realtime, and Quicktime (CPC-700, 700NL, and 700NLE)

NEW Subtitle With No Generation Loss
The CPC-700NLE software can now position, time code, and generate subtitles without a hardware character generator. The result is better video quality without going down a generation, plus it saves you the expense of purchasing a hardware character generator. Subtitles can be done in any language using any TrueType font. Imagine, you can now subtitle digital video on your notebook computer!

CPC-700NLE & CCaption: The ideal choice for NLEs

The CPC-700NLE and CCaption-NLE are our most popular captioning solutions for users with non-linear editing systems. The CPC-700NLE lets you position, time-stamp and encode captions. CCaption-NLE does not have script preparation capabilities, and encodes already prepared caption files.

The CPC-700NLE works with almost any digital video file. After importing the script, you can format and time-stamp the captions.

Next the CPC-700NLE exports a black video file with closed captions. This file can then be used with your existing NLE system to insert the captions onto your video.

The CPC-700NLE can also be used to caption DV video directly on the hard drive without using an NLE.

Software Prices

CPC-700NLE: Script Preparation & Software Encoding *NEEDED*	$7,995
CPC-700NL: Script Preparation & Encoding	$5,995
CPC-700: Script Preparation & Encoding	$4,995
CPC-600: Script Preparation and Encoding w/o time code	$2,995
CPC-500: Realtime only	$1,995
CPC-710: Encoding only	$995
CCaption-DV: Encoding only	$995
CCaption-NLE: Encoding only	$1,995

System Requirements

Windows 95/98/NT/ME/2000/XP compatible computer

A closed caption hardware encoder or CCaption software encoder
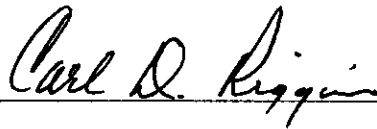
FIRST BAPTIST CHURCH

SUMMARY OF INCOME - EXPENSE
2005

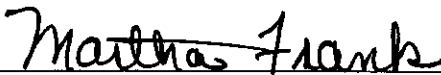| MONTH	INCOME	EXPENSE	+ / -
Jan	$263,574	$181,319	$82,255
Feb	$242,872	$231,649	$11,223
Mar	$284,570	$260,773	$23,797
April	$261,465	$245,037	$16,428
May	$295,017	$260,582	$34,435
June	$270,995	$226,876	$44,119
July	$302,290	$224,241	$78,049
Aug	$234,783	$273,609	-$38,826
Sept	$287,855	$258,446	$29,409
Oct	$302,614	$238,524	$64,090
Nov	$248,400	$260,583	-$12,183
Dec	$417,226	$712,956	-$295,730
TOTAL	$3,411,661	$3,374,595	$37,066

AFFIDAVIT

I the undersigned being first duly sworn verify under oath that I am the Director of Media Ministries at First Baptist Church of Fort Smith, Arkansas and prepared the material consisting of eight pages which is attached to this affidavit and swear that is true and correct to the best of my knowledge and belief..

Carl D. Riggins

Carl D. Riggins

Subscribed and sworn to before me the undersigned notary public on this fourth day of May, 2006.

Martha Frank

Martha Frank

My commission

expires November 1, 2006